

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re:

ROMAN CATHOLIC CHURCH OF THE
DIOCESE OF GALLUP, a New Mexico
corporation sole,

Debtor.

Jointly Administered with:

BISHOP OF THE ROMAN CATHOLIC
CHURCH OF THE DIOCESE OF GALLUP,
an Arizona corporation sole.

This pleading applies to:

- ☒ All Debtors.
☐ Specified Debtor.

Chapter 11

Case No. 13-13676-t11

Jointly Administered with:

Case No. 13-13677-t11

**DEBTORS' JOINDER TO "NEW MEXICO PROPERTY AND CASUALTY
INSURANCE GUARANTY ASSOCIATION'S OBJECTION TO JANE L.S. DOE'S,
ALFRED MOYA'S, AND JOHN M.H. DOE'S MOTIONS FOR RELIEF FROM
AUTOMATIC STAY" [DKT. NO. 415]**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The Roman Catholic Church of the Diocese of Gallup ("**RCCDG**") and the Bishop of the Roman Catholic Church of the Diocese of Gallup (the "**Arizona Entity**," and together with RCCDG, the "**Debtors**"), the debtors and debtors-in-possession in the above-captioned, jointly administered cases (the "**Reorganization Cases**"), hereby file this joinder to "New Mexico Property and Casualty Insurance Guaranty Association's Objection to Jane L.S. Doe's, Alfred Moya's, and John M.H. Doe's Motions for Relief from Automatic Stay" [Dkt. No. 415] (the "**NMPCIGA Objection**").

In addition to the procedural deficiencies cited in the NMPCIGA Objection, each "Motion for Relief from Automatic Stay" [Dkt. Nos. 396-398] ("**Stay Relief Motions**") is

defective due to, among other reasons, the failure of Mr. Robert Pastor and Mr. John Manly to obtain admission *pro hac vice*¹ or formally appear and make proper disclosures in these Reorganization Cases.

Upon information and belief, neither Mr. Pastor nor Mr. Manly is admitted to the New Mexico State Bar and neither they nor their firms have filed any application before this Court allowing them to appear *pro hac vice* or allowing them to waive the requirement to affiliate local counsel pursuant to NM LBR 9010-1. Also, as entities representing multiple creditors acting in concert to advance their common interests, Messrs. Pastor and Manly have violated the disclosure requirements of Fed. R. Bankr. P. 2019. The failure to file any notice of appearance in the Reorganization Cases further violates Fed. R. Bankr. P. 9010(b).

The Debtors reserve all their rights to, and will, file a substantive objection to the Stay Relief Motions, in addition to this joinder in NMPCIGA's Objection on procedural grounds.

RESPECTFULLY SUBMITTED this 3rd day of August, 2015.

/s/ Elizabeth S. Fella

Susan G. Boswell (AZ Bar No. 004791)
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-and-

¹ The signature blocks on the Stay Relief Motions assert that Mr. Pastor and Mr. Manly are admitted *pro hac vice* to practice before this Court, but the docket sheets for the Reorganization Cases do not support this assertion.

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CERTIFICATE OF SERVICE

Pursuant to F.R.C.P. 5(b)(3), F.R.B.P. 9036 and NM LBR 9036-1(b), I hereby certify that service of the foregoing “Debtors’ Joinder to ‘New Mexico Property and Casualty Insurance Guaranty Association’s Objection to Jane L.S. Doe’s, Alfred Moya’s, and John M.H. Doe’s Motions For Relief From Automatic Stay’ [Dkt. No. 415]” was made on August 3, 2015 via e-mail and the notice transmission facilities of the Bankruptcy Court’s case management and electronic filing system on the below listed parties, and via U.S. Mail to all additional parties on the Debtors’ List of Creditors Holding 20 Largest Unsecured Claims.

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